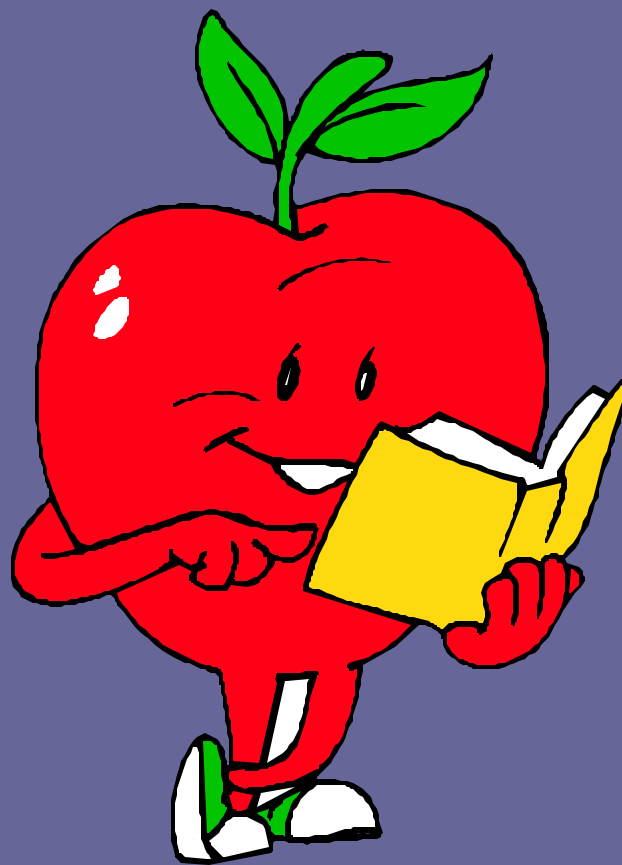


FOOD STAMP NUTRITION EDUCATION PROGRAM PLAN GUIDANCE

Federal Fiscal Year 2003



United States Department of Agriculture
Food and Nutrition Service
Food Stamp Nutrition Education Program
March 2002



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INTRODUCTION

The U.S. Department of Agriculture, Food and Nutrition Service (FNS) is committed to improving the nutrition and health status of low-income Americans and to assisting in meeting the Healthy People 2010 nutrition and related objectives for the Nation. The FNS vision statement emphasizes this commitment: To lead America in ending hunger and improving nutrition and health.

The FNS mission is to increase food security and reduce hunger in partnership with cooperating organizations by providing children and low-income people access to food, a healthful diet, and nutrition education in a manner that supports American agriculture and inspires public confidence.

The Food Stamp Nutrition Education Program is intended to carry out this vision and mission for the Food Stamp Program.

FNS NUTRITION EDUCATION

FNS administers 15 nutrition assistance programs that touch the lives of one in six Americans each year, with the potential to make a tremendous difference in the lives of children and low-income populations by promoting food security, reducing hunger, and improving nutritional status. These programs include:

- the Child Nutrition Programs, which provide meal service in school, day care and institutional settings,
- the Food Distribution Programs, which provide food commodities for use in the Child Nutrition Programs, congregate meals, and home distribution,
- the Special Supplemental Nutrition Program for Women, Infants and Children (WIC), which provides supplemental foods and nutrition education to pregnant and postpartum women, and young children, and
- the Food Stamp Program, the cornerstone of all FNS programs which provides basic nutrition support to millions of low-income households.

FNS programs have been successful in increasing access of at-risk groups to nutritious foods. In conjunction with State and local partnerships, they also hold great potential to influence food choices and to support healthy eating and related nutrition behaviors. These programs represent extraordinary opportunities to reach participants with nutrition and healthy lifestyle messages, and to repeatedly reinforce those messages so that healthy behaviors are the ultimate result.

Effectiveness of nutrition education can be greatly enhanced through collaboration and coordination with others interested in promoting health and nutrition in low-income populations. Such collaboration and coordination can result in delivery of more uniform messages targeting key community nutrition issues and can facilitate use of multiple channels for communicating these messages to the public. FNS strongly encourages collaboration and coordination of efforts with statewide public and private partners to enhance both the reach and efficacy of the nutrition education efforts. Important partnerships include those with other Federal Nutrition assistance programs such as WIC and the Child Nutrition Programs. Working together, messages of good nutrition can be supplemented and enhanced.

FOOD STAMP NUTRITION EDUCATION PROGRAM

Goal

The goal of the Food Stamp Nutrition Education Program is to provide educational programs that increase, within a limited budget, the likelihood of food stamp recipients making healthy food choices consistent with the most recent dietary advice as reflected in the Dietary Guidelines for Americans and the Food Guide Pyramid.

Objectives

The objectives or core elements of the Food Stamp Nutrition Education Program are to:

- Assist food stamp participants to adopt diet and lifestyle behaviors that are consistent with the Dietary Guidelines for Americans and the Food Guide Pyramid. (Dietary Quality)
- Insure that low-income individuals and families receiving food stamps have enough to eat without resorting to emergency food assistance and ensuring that people eligible for the Food Stamp Program but not participating are made aware of its benefits and how to apply for them. (Food Security)
- Improve food stamp households' safe handling, preparation and storage of food. (Food Safety)
- Enhance practices related to thrifty shopping for and preparation of nutritious foods by food stamp households. (Shopping Behavior/Food Resource Management)
- Support changes that make nutritious diets more accessible to food stamp households. (System and Environmental Change)

NUTRITION EDUCATION PLAN

This document provides guidance for Food Stamp Nutrition Education Program State Plans for FY 2003 to State agency level cooperators. This guidance:

- assists with the preparation of the State nutrition education plan;
- provides sample formats for optional use (appendix A);
- describes reporting requirements for activities covered by the plan (appendix B);
- serves as a reference for policy regarding allowable costs and other policy issues (appendix C);
- provides definition of key terminology (appendix D);
- identifies a new web-based nutrition education resource for nutrition educators (appendix E).

Submitting the Nutrition Education Plan

Under current Food Stamp regulations at 7 CFR 272.2(d), State agencies have the option to provide nutrition education. State agencies seeking federal funding to implement or to continue operating a Food Stamp Nutrition Education Program must submit a plan to FNS for approval.

As specified under 7 CFR 272.2(e) of the regulations, the Food Stamp Program Nutrition Education Plan must be signed by officials of the State agency and must be submitted to the FNS Regional Office annually no later than August 15 for the following Federal fiscal year's operation. The plan may be submitted before August 15, if a State budget cycle requires a commitment before the beginning of the Federal fiscal year. State agencies must submit amendments to their plans to FNS for approval whenever there are increases in budget or changes in the scope of activities in an approved plan. State agencies may submit multi-year plans with the understanding that 1) any changes in planned activities and budget must be approved as an amendment to the plan and 2) approval of budgets for planned activities is on an annual basis. (Because the Food Stamp Program is funded on an annual basis, it is not possible for FNS to make budgetary commitments into future years).

State agencies are responsible for making allowable cost determinations and are liable for repayment of Federal funds should those costs later be determined unallowable. FNS Regional Office financial management and

program staff are available to provide technical and other assistance to State agencies in developing nutrition education plans.

Messages

The Dietary Guidelines for Americans are the foundation for nutrition education in all nutrition assistance programs. Therefore, messages delivered through the FSNEP are to be consistent with federal Dietary Guidelines. In summary, these Guidelines are as follows:

- Aim for a healthy weight
- Be physically active each day
- Let the pyramid guide your food choices
- Choose a variety of grains daily, especially whole grains
- Choose a variety of fruits and vegetables daily
- Keep food safe to eat
- Choose a diet low in saturated fat and cholesterol and moderate in total fat
- Choose beverages and foods to moderate your intake of sugars
- Choose and prepare foods with less salt
- If you drink alcoholic beverages, do so in moderation

States are encouraged to establish a review mechanism to ensure that all nutrition messages conveyed as a part of FSNEP are consistent with these Guidelines. It is expected that nutrition education messages will logically be tailored to address the most urgent nutrition education needs of recipients.

However, on the basis of the Guidelines, FNS encourages State agencies to particularly focus on the following core messages through the Food Stamp Program and other FNS programs, as these messages are essential for advancing the FNS strategic nutrition education goal and objectives as well as current national nutrition issues.

- increase intake of fruits, vegetables and whole grains
- eat lower fat foods more often
- be physically active and maintain a healthy weight

Nutrition Education Elements

States should focus on the five core elements when making their annual plans of nutrition education. These five core elements, identified by an expert panel, reflect the primary emphasis areas in the Food Stamp Program. Of these five core elements, however, dietary quality should be considered among the most prominent. A strong focus and priority should be placed on addressing the core element of “Dietary Quality” in a comprehensive manner.

The core elements are:

- Dietary Quality
- Food Security
- Food Safety
- Food Resource Management/Shopping Behaviors
- System and Environmental Changes

The following is a brief explanation of the five core elements:

Dietary Quality

Applies to the nutritional value of food acquired, and how well overall diets of food stamp participants compare to recommended guidelines such as the Food Guide Pyramid and the Dietary Guidelines for Americans (e.g., increasing fruit, vegetable and grain consumption to recommended levels; decreasing fat consumption; and being physically active to maintain a healthy weight).

Food Security

Applies to the general well being of a household in terms of always having enough to eat without having to seek emergency food, such as from food pantries, to tide the household over through the end of the month. A food secure household has assured access at all times to enough food for an active, healthy, life including the ready availability of nutritionally adequate, safe foods and the assured ability to acquire acceptable foods in socially acceptable ways. In measuring the food security status of households, “Food Secure” is at one end of the scale and “Hunger” (or severe food insecurity) is at the other end. Promotion of participation in the Food Stamp Program to eligible persons in the context of nutrition education is a critical aspect of this core element.

Food Safety

Applies to how food is handled. Specifically, it deals with issues such as hand-washing, length of time food is left without refrigeration, the temperature at which food is stored, and whether food is properly cooked.

Shopping Behavior/Food Resource Management

Applies to the practices related to thrifty shopping for nutritious foods. These include practices related to how and where food is acquired, how often food is purchased, and the types of food purchased. These also include such skills as making shopping lists, reading labels for nutritional value, and menu planning.

System and Environmental Change

Applies to positive influences in the community that can promote and facilitate the availability of nutritious diets to, and healthier food choices by, Food Stamp Program participants, consistent with one or more of the States' Food Stamp Program Nutrition Education goals. FNS encourages use of collaborative approaches to promote change to advance core objectives. Food Stamp Program nutrition education funds may be spent only for modest, low cost, reasonable and necessary activities to promote a change that helps Food Stamp Program recipients to make healthy food choices and increase access to healthy foods, and not for the change itself. For example, efforts to promote healthy environments in community settings serving low income people by educating community leaders and other concerned citizens about the benefits of improving access to nutritious foods or promoting increased physical activity would be allowable costs. Encouraging Food Stamp Program participants to shop at farmers markets would be another example of allowable costs. Using Food Stamp Nutrition Education Program funds to establish, staff or maintain a farmers market or a school salad bar would be examples of unallowable costs. As another example, technical training for food service workers or managers or food bank or soup kitchen personnel is unallowable. Lobbying is prohibited. (See definitions in Appendix D for more information on lobbying).

FOOD STAMP PROGRAM

Fiscal Year 2003

ANNUAL PLAN FOR NUTRITION EDUCATION

FOR

STATE AGENCY_____

FISCAL YEAR_____

DATE_____/____/_____

Certified By:

STATE AGENCY NUTRITION COORDINATOR

DATE

OR

STATE FOOD STAMP DIRECTOR

Certified By:

STATE AGENCY FISCAL REVIEWER

DATE

STATE PLAN GUIDANCE

The following section will take you step by step through completing the application for your nutrition education plan. Part I asks you to report on Fiscal Year 2002 activities both completed as well as ongoing, and Part II asks you to report on Fiscal Year 2003 planned activities. Appendix A provides formats for reporting for the convenience of State agencies. The use of these formats is optional but recommended. Prior to writing your plan, you may want to review all appendices for additional information.

Part I. FINAL REPORT OF FISCAL YEAR 2002 NUTRITION EDUCATION ACTIVITIES

Section A. RESULTS

Summarize the nutrition education activities specified in your fiscal year 2002 plan and report your progress to date in improving nutrition and lifestyle behaviors of program participants. Upon completion of fiscal year 2002, provide a final report of your prior fiscal year activities on or before November 30th. By written request to the FNS region, States may ask to extend the deadline. FNS regions reserve the right to provide contingency plan approval pending receipt of the final report.

I. Provide a report of nutrition education activities and interventions used in Fiscal Year 2002 and describe progress in improving nutrition and lifestyle behaviors of Food Stamp participants. Areas to cover include:

- Positive aspects of the program that contributed to accomplishing the objectives.
- Barriers encountered.
- Least successful strategies, tools and materials.
- Behavior outcomes using performance measures, such as improvement in safe food handling.
- Most successful key strategies, tools, and materials developed in the past year by the food stamp nutrition education program.
- Tools used to measure reported results.

II. Describe several of your key projects and interventions that you undertook in the following major areas of public interest, and provide related materials:

- Efforts directed at increasing consumption of fruits and vegetables in low-income populations (including those focused on racial/ethnic groups);
- Interventions and activities that promote healthy weight (includes a nutrition and physical activity focus);
- Partnerships and collaborations that involve other Programs in planning and delivering nutrition education.
- Nutrition education activities conducted in Food Stamp offices where food stamp eligibility assessment is completed.

An optional format for presenting this information is available as Attachment 6, in Appendix A.

Section B. DATA

Describe the population reached with nutrition education using the categories below:

- The total number of low-income households reached.
- The number of direct contacts made through your States' activities. (This figure represents the number of people participating in education interventions, such as classes, workshops, or group discussions.) Each intervention with an individual is counted separately. For example, if one person attends 8 classes on nutrition, this is counted as 8 direct contacts.
- The number of indirect contacts made through your State's activities. (The number of people indirectly exposed to a range of educational materials, such as public service announcements, billboards, newsletters, materials computer programs etc.)

If the counts above include potentially eligible food stamp participants and/or other non-participants, provide a separate sub-count for each measure for participants, and non-participants to the extent you can.

Note: Given the inherent difficulty in capturing consistent data on nutrition education contacts, the widely varying nature and scope of various types of contacts, and the fact that counts may be made of households or of individuals, FNS is requesting recommendations for improvements, and will continue to look for non-burdensome but meaningful ways to improve data collection.

Part II. FISCAL YEAR 2003 NUTRITION EDUCATION PLAN

Section A. NEEDS ASSESSMENT OF TARGET POPULATION (FOR FISCAL YEAR 2003)

The Food Stamp Act requires that nutrition education activities be directed exclusively to Food Stamp program applicants and participants. However, on a project basis, a waiver may be granted for activities that benefit other low income persons as long as at least 50 percent are Food Stamp Program clients, applicants, and other persons with household incomes at or below 185 percent of poverty. The waiver request shall explain how each project will ensure that the target group will meet this goal. See page 36, A.3, for further information about waiver requirements. (See Definitions in Appendix D for definition of “project”).

- I. Provide an overview and description of the food stamp population you will serve.
- II. Describe your needs assessment procedure to learn about the specific needs of your target audience that will be used in program planning.
- III. Describe the nutrition issues of greatest concern to your Food Stamp Program participants and how you intend to address them.

Section B. GOALS AND OBJECTIVES (FOR FISCAL YEAR 2003)

List your behavioral goals and objectives and the educational strategies and vehicles you will use to achieve them. Describe the following: (Appendix A, Attachment 1 provides an optional format for reporting your goals and objectives).

- I. Describe educational goals and objectives in measurable terms: cognitive, affective, and behavioral. Examples of objectives include:
 - Using the Nutrition Facts Label, participants will identify the fat content of different food items (cognitive).
 - After participating in a session about food safety, learners will be motivated to learn more about sanitation (affective).
 - As a result of attending a 5-A-Day lesson, participants will consume one additional serving of vegetables per day (behavioral).
- II. Describe the methods, strategies, and tools that will be used to achieve the goals and objectives such as:
 - Plans for reaching the target population
 - Social marketing strategies for development, and dissemination of educational interventions
 - Educational resources and/or materials to be used for each objective.
- III. Identify educational materials and items that are currently being used or that will be developed. In order to avoid duplication of effort, State agencies may refer to the databases listed below and use available resources as appropriate. This assessment of existing information should be done prior to developing new materials for nutrition education efforts.
 - Food Stamp Nutrition Connection
<http://www.nal.usda.gov/fnic/foodstamp/index.html>
 - Eat Smart. Play Hard.™
<http://www.fns.usda.gov/FNSmascot/default.htm>
 - WIC Resource System
<http://www.nal.usda.gov/wicworks/>
 - Team Nutrition
<http://www.fns.usda.gov/tn/Database/index.htm>

Additional resources may be found at:

<http://www.nal.usda.gov/foodstamp>

See Appendix E for detailed information about this new educational resource, called the Food Stamp Nutrition Connection. Please note that we strongly encourage States to submit their own materials to the Food Stamp Nutrition Connection web site.

IV. Materials

- A. Identify non-English materials (specify language).
- B. Insure that materials developed with Food Stamp Program funds include the following non-discrimination statement:

“In accordance with Federal law and U.S. Department of Agriculture’s policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, religion, political beliefs or disability.”

“To file a complaint of discrimination, write USDA, Director of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.”

Note: There are no print size requirements if the statement above is used. If the material is too small to permit the full statement to be included, the material must at a minimum include the statement, in print size no smaller than the text, that **“This institution is an equal opportunity provider and employer.”**
- C. Additionally, provide credit to the Food Stamp Program as a funding source using language such as “this material was funded by USDA’s Food Stamp Program.” This credit line must appear on newly developed materials; adding it to reprints is encouraged.
- D. Additionally, provide a brief outreach message about the Food Stamp Program using language such as, “The Food Stamp

Program provides nutrition assistance to people with low income. It can help you buy nutritious foods for a better diet. To find out more, contact (local office or toll-free number, or other useful information to help identify how to get services)." This need not be included for audiences that are exclusively Food Stamp Program participants.

- V. Describe the timeframe for accomplishment of objectives.
- VI. Describe the performance measures or indicators of expected outcome and how it was measured; for example, change in behavior (ate one extra fruit per day) or improvement in cooking skills (learned how to properly boil eggs).
- VII. Describe efforts to coordinate, complement and supplement other programs serving a low-income population, such as WIC, the Child Nutrition Programs, or other programs providing nutrition benefits or other services to low income persons.

Section C. STAFFING (FOR FISCAL YEAR 2003)

Provide the following summary by project for all staff in the coming fiscal year's budget that will carry out food stamp nutrition education functions by project. [Appendix A, Attachment 2 (use optional)]. Provide the following information by project:

- Position Title
- Summary of Duties associated with the Food Stamp Nutrition Education Program by project
- Salary
- Percent of time allocated for Food Stamp Nutrition Education Program (Estimate may be used for budget, but actual time spent must be used for billings)

Section D. BUDGET SUMMARY

I. Waivers

Provide project-specific waivers that have been submitted for approval for the FY 2003 nutrition education plan. See Appendix C, section A.3 for information on waivers and documentation needed.

II. Contracted Nutrition Education Services:

If the State agency intends to contract for food stamp nutrition education with sub-grantees, list each sub-grantee that is a recipient of Federal grants, cooperative agreements or contracts related to the Food Stamp Nutrition Education Program. Include the following for all costs: [Appendix A, Attachment 3 (use optional)]

- Funding Source
- Description of Services
- Cost Amount

III. Budget Information

For each nutrition education project:

- Identify the full-time equivalent (FTE) and position of staff that will be conducting food stamp nutrition education, and what portion of these salaries is Federal.
- Attach copy of any interagency agreement(s) that identifies how the federal funds will be shared between the State or county agency and/or other agencies. If the State agency subcontracts with another agency or organization to accomplish nutrition education activities, the State agency is responsible for the accuracy of reimbursement claims submitted by the subcontractor/grantees. In your plan, you will need to submit a list of all sub-grantees and amount of funding for each grant.
- Provide the State and Federal cost for each planned nutrition education project. Provide a detailed breakdown that includes at a minimum the information contained in Appendix A, Attachments 4 and 5 (use optional). Include total cost for nutrition education.

Section E. ASSESSMENT OF EFFECTIVENESS OF NUTRITION EDUCATION PROGRAM

Evaluation is important for accountability, planning, and learning how to continuously refine and improve nutrition education for low-income families. The following three types of evaluation are appropriate and should be included in your State plan: formative which can involve pretesting of draft nutrition education materials to answer questions about whether materials

are understandable, relevant, credible and acceptable to the target audience; process which can involve such measures as tracking the number of materials distributed, the number of clients reached, effectiveness of alternate methods of delivering nutrition education and/or barriers to implementing the intervention; and, outcome or impact to learn how effective the intervention was in changing the target populations' attitudes, awareness or behavior. When describing your evaluation plans, the initial focus should be on projects that involve new or revised materials, new interventions or different target populations.

For information about program evaluation, FNS recommends the following guidance:

- Journal of Nutrition Education: 33, Supplement 1, 2001
- Evaluating Social Marketing in Nutrition: A Resource Manual
<http://www.fns.usda.gov/oane/menu/published/nutritioneducation/Files/evalman-2.PDF>.
- WIC Evaluation Resource Guide
<http://www.fns.usda.gov/oane/menu/published/nutritioneducation/Files/evalman-2.PDF>.

Section F. ASSURANCES

To assure compliance with policies described in this guidance, the Food Stamp Nutrition Education Program Plan must include the following assurances that:

- Nutrition education activities are conducted exclusively for the benefit of Food Stamp Program participants and applicants.
- Waivers are approved for each project with nutrition education activities that include non-participants, however, primary beneficiaries must be Food Stamp Program participants, applicants, and other low income people. At least 50 percent of the target population must have gross incomes at below 185 percent of poverty.
- Approved Food Stamp Nutrition Education Program activities funded by the State agency through the Expanded Food and Nutrition Education Program (EFNEP) are designed to expand the State's current EFNEP in order to serve additional food stamp recipients or to provide additional educational services to EFNEP clients who are food stamp recipients.

- Cash or in-kind donations from other non-Federal public agencies to the Food Stamp Nutrition Education Program have not been claimed or used as a match or reimbursement under any other Federal program.
- Costs incurred by other non-Federal agencies for goods and services for food stamp nutrition education and which are then donated to the Food Stamp State agency make up the public in-kind contributions that are included in the State share of costs that are eligible for Federal reimbursement. They may not be used as a match under any other Federally funded project.
- Documentation of State costs, payments, and donations for approved Food Stamp Nutrition Education Program activities are maintained by the State and will be available for USDA audit.
- Contracts are procured through competitive bid procedures governed by State procurement regulations.
- Program activities are conducted in compliance with all applicable Federal laws, rules, regulations including civil rights and OMB circulars governing cost issues.
- Program activities do not supplant existing nutrition education programs, and where operating in conjunction with existing programs, enhance and supplement them. For example, the cost for a home economics teacher to conduct an extracurricular cooking club for teenaged food stamp recipients could be allowable supplementation, while paying for the teacher to conduct routine nutrition school classes from food stamp funds would constitute inappropriate supplanting of ongoing school curricula.
- Program activities are reasonable and necessary to accomplish program objectives and goals.
- Materials developed with Food Stamp Program funds include the appropriate non-discrimination statement, credit provided to the Food Stamp Program as a funding source, and a brief message about how the Food Stamp Program can help provide a healthy diet and how to apply for benefits.

Section G. SIGNATURES

The document must be signed by both the State agency Nutrition Coordinator (or alternatively, the State Food Stamp Program Director) and a State agency Fiscal Reviewer prior to submission.

APPENDIX A

Suggested Formats for Attachments

**Appendix A
Attachment 1**

| GOALS AND OBJECTIVES FOR FISCAL YEAR 2003 | | | | | |
|---|-------------------|--|------------|---------------------|---------------------|
| Objective | Method to be Used | Educational Resources and/or Material (Identify non-English) | Time Frame | Performance Measure | Coordination Effort |
| | | | | | |

Appendix A
Attachment 2

| STAFFING FOR FISCAL YEAR 2003 | | | |
|-------------------------------|------------------------------|--------|-----------------------------------|
| Position Title | Summary of Duties by Project | Salary | % Time for FS Nutrition Education |
| | | | |

Appendix A
Attachment 3

| CONTRACT SERVICES | | BUDGET SUMMARY |
|-------------------|-------------------------|----------------|
| Funding Source | Description of Services | Cost Amount |
| | | |

Appendix A
Attachment 4

| BUDGET INFORMATION | | | | |
|---|------------------------|----------------------------|-----------------------------|----------------|
| Expenses | (a) State Cont. | (b) Public Non-Fed. | Total State (a)+ (b) | Federal |
| Project: | | | | |
| Salary/Benefits | | | | |
| Contracts/Grants/Agreement | | | | |
| Non-Capital Equipment/Supplies | | | | |
| Materials | | | | |
| Travel | | | | |
| Administrative | | | | |
| Building/Space | | | | |
| Maintenance | | | | |
| Equipment & other Capital Expenditures | | | | |
| Indirect Cost | | | | |
| Total Cost | | | | |

Appendix A
Attachment 5

| BUDGET SUMMARY | | | |
|--------------------------|-------------------|-------------------------|---------------------------|
| Project/Sub-grant | FTE | State Cost | Federal Cost |
| | | | |
| | Total FTES | Total State Cost | Total Federal Cost |

Total Cost: [(A)+(B)]=Total Nutrition Education Costs

Appendix A

Attachment 6

Directions for Completing Nutrition Intervention Description Form

TOPIC: Which Food Stamp Nutrition Education objective or nutrition subject area does this project address? (i.e., diet quality, physical activity, food security, lowering fat, increasing fruit and vegetable consumption.)

PROJECT TITLE: Provide the title of the project and the type of initiative/initiative (e.g., nutrition education curricula, training programs, community interventions, modules, research projects, etc.)

DEPARTMENT/AGENCY/PROGRAM: Provide the name of the department, agency, or program that is responsible for the project (e.g., VA Dept. of Health, NJ Food Stamp Program, CA WIC, Denver Food Bank, etc.)

NAME AND TITLE OF CONTACT PERSON: Person who will receive and answer future inquiries about the project. The contact person should be involved with the project or program activities.

ADDRESS: Provide the complete address of the contact person, including telephone number, fax number, and E-mail address.

GOAL AND OBJECTIVES: Provide the program or project goal and related objectives, or project purpose.

PROJECT DESCRIPTION: Include information about the different components of the project, such as number of educational contacts planned per participant, type of contacts, educational theory, or approaches used such as social marketing. Discuss steps used in the implementation of the project. If the project is a research project, include the design, methodology and attach an abstract.

TARGET AUDIENCE DESCRIPTION: Include information about the characteristics of the project's target audience: age range(s), gender, racial/ethnic background, and nutrition or health risk (such as rate of obesity, overweight and food insecurity).

PROJECT TIMELINE: State the project start and end dates. Indicate if the project is ongoing.

REACH: Report the number of people reached, geographic areas served, the number and/or type of entities, agencies, or organizations that implemented the project; describe the project sites where the intervention was conducted (i.e. number of schools, churches, community centers, etc.) and other information to indicate the reach of the project.

MATERIALS: List all education materials and activities that were developed or modified for the project along with a brief description of the content and purpose of each material. Be sure to list both those materials that have been developed by your program or agency, and those adapted from other programs or agencies - e.g., State WIC, Food Stamp Programs, or Food and Nutrition Service. In addition, include a copy of all **print** education materials with your completed Nutrition Education Intervention Form. Include any FNS resources used in the interventions such **Eat Smart. Play Hard.** [™] or **Team Nutrition** materials.

RESULTS/EVALUATION: Describe any current or planned evaluation activities for the project. Include results of formative, process or outcome evaluations such as focus group reports. In addition, you may include information about barriers to conducting the project, changes planned to overcome these barriers, and lessons learned in the process. If the evaluation has not been conducted but is planned for the future, please indicate.

SYSTEMS and ENVIRONMENTAL CHANGE: Describe any systems or environmental changes promoted to support the objectives of the intervention and progress in achieving the change.

PARTNERSHIPS: Describe collaborative activities and partnerships related to this effort. Indicate any involvement by other FNS Programs such as WIC, FDPIR, School Meal Programs, and identify any intra- or inter- State agency memorandums of understanding related to the intervention.

FUNDING SOURCES: List all previous and current funding sources for the project.

Nutrition Education Intervention Description Form

Topic: _____

Project Title: _____

Department/Agency/Program: _____

Name And Title of Contact Person: _____

Address, Telephone, Fax and Email for Contact Person: _____

Goal and Objectives: _____

Project Description: _____

(Use Additional Sheets If Necessary)

Target Audience: _____

Project Timeline (Include start date and end date): _____

Reach: _____

Materials: _____

(Use Additional Sheets I f Necessary)

Results/Evaluation: _____

(Use Additional Sheets I f Necessary)

SYSTEMS and ENVIRONMENTAL CHANGE:

Partnerships: _____

Funding Sources: _____

APPENDIX B

REPORTING AND RECORD RETENTION REQUIREMENTS

Form 366A

In addition to submitting the nutrition education plan, State agencies must submit FNS-366A, Budget Projection Statement, for FNS approval. State agencies must report their projected requested Federal funding for nutrition education on FNS Form FNS 366A, line 17, Nutrition Education. This report is due August 15th in the FNS Regional office for the upcoming Federal fiscal year.

Form SF-269

The State agency must report nutrition education expenditures, in Column 17- Nutrition Education- on FNS Form SF-269. This report is to be submitted quarterly, 30 days after the end of each quarter. A final report is due 90 days following the end of the Federal fiscal year.

Record Retention and Management

Food Stamp Program regulations require that all records be retained for three years from fiscal closure. This requirement applies to fiscal records, reports and client information.

APPENDIX C

COST POLICY

The following discusses the costs that can be approved for Federal reimbursement under an approved Food Stamp Nutrition Education Plan.

Food Stamp Program Reimbursement Structure

Under Section 16 of the Food Stamp Act of 1977, as amended, a State food stamp agency is reimbursed 50 percent for allowable administrative program costs that are reasonable and necessary to operate approved nutrition education activities. Because State costs, by law, are reimbursed, the Food Stamp Nutrition Education Program is not a “grant” program, which provides a set level of funding for specific activities for a specific period of time, nor is it technically a match program. It is a reimbursement program, and reimburses 50 percent of States’ allowable expenditures. While plan activities are approved on an annual basis, allowable costs may be reimbursed in the subsequent year if the activity overlaps fiscal years or if payment for services delivered during the fiscal year was delayed. Nutrition education project obligations must be established in the fiscal year the funds are appropriated but disbursements against these obligations may occur after the fiscal year closes. Federal reimbursement is subject to the availability of Federal funds. States agencies have a 2-year deadline to claim prior year costs. Expenditures must be submitted within 2 years after the calendar quarter in which the State (or local) agency incurred the cost.

Allowable Costs

Allowable costs are specified under OMB Circulars A-87, A-21, and A-122, Departmental rules at 7 CFR 3016 and Food Stamp Program rules at 7 CFR Part 277. To be allowable, all costs charged to FNS must be valid obligations of the State, local government or sub-grantee.

State Plan Amendments

If State agencies determine that actual expenditures will exceed planned expenditures, a State must submit a plan amendment prior to incurring the expenses for Federal approval to ensure that costs are allowable, reasonable and necessary. Further, if the scope of the activities in a plan change, regardless of the impact on the planned expenditures, a State must submit a plan amendment for FNS approval.

A. Allowable and Unallowable Administrative Expenses

Allowable administrative costs are costs for operating the Food Stamp Nutrition Education Program which include all administrative expenses that are reasonable and necessary to operate approved nutrition education activities.

Allowable administrative expenses include:

- salaries and benefits of personnel involved in food stamp nutrition education and administrative support;
- office equipment, supplies, postage, duplication costs and travel that is necessary to carry out the project's objectives;
- development and production of food stamp educational materials;
- lease or rental costs;
- maintenance expenses;
- other indirect costs;
- charges for travel based on official State, local or university travel regulations. (Charges for travel for the purpose of fulfilling the approved Nutrition Education Plan.)

Unallowable administrative expenses- Listed below are unallowable costs per A-87 and A-21 for State and local governments: (Similar lists are found in A-122, the Circular applicable for non-profit organizations).

- Bad Debts- Uncollected accounts or claims, and related costs.
- Contingencies- Contributions to an emergency reserve or similar provision for unforeseen events. (These are not insurance payments which are allowable).
- Contributions and Donations- (Usually these are political in nature.)
- Entertainment-Costs which are primarily for amusement or social activities. (This is actually one with a lot of exceptions. Meals for example are cited in the Circular, but within the context of training, meals might be allowable. There are a number of costs here which require a reasonable judgment based on why or when the activity takes place).
- Fines and Penalties- Violations or penalties for failure to comply with Federal, State, or Local laws.
- Governor's Office- Specifically costs of general government. Costs which may be directly charged to a Federal grant may be allowable.

(For example if a person assigned to the governor's office devotes 100 percent of his/her time to the Food Stamp Program, the cost may be allowable. Each situation, however, must be judged on its own merit).

- Indemnification- Payments to third parties and other losses not covered by insurance.
- Legislative expenses.
- Losses Not Covered by Insurance (see Indemnification above. These costs are similar, but not the same).
- Under Recovery of Costs under Federal Funding Agreements- Shortfalls in one grant cannot be charged to another Federal grant. (This is not the same as charging two Federal grants for a share of the costs of the activity if both agencies benefit from the activity funded. However, an allocations basis must be established for sharing the costs in proportion to the benefit each receives.)
- Alcoholic Beverages.

For A-21 there are some *unallowable cost* categories in addition to those listed above:

- Advertising and Public Relations- Unless used for recruitment of staff, acquisition of material for the grant, or publishing the results of the grant.
- Alumni Activities.
- Commencement and Convocations.
- Legal Fees Which Result From a Failure to Follow Federal, State or Local Laws. If certain conditions are met, the Federal government may allow some legal fees.
- Executive Lobbying.
- Goods and Services for Private Use.
- Housing and Personal Living Expenses.
- Interest, Fund Raising, and Investment Management- (For interest, there are exceptions. But if the cost is shown it needs to be examined in light of the exceptions.)
- Any and All Political Party Expenses.
- Preagreement Costs- All costs incurred prior to the grant award.
- Scholarships and Student Aid- (There are exceptions which should be reviewed if these costs appear in budget.)
- Student Activity Costs.

- Travel- Allowable but with restrictions as to amounts involved, level of transportation costs (i.e. no first class tickets).

Note: Remarks in parenthesis represent clarification by the Food and Nutrition Service and are not Circular language.

A.1 Property Procurement and Management

The State agency and all sub-grantees must follow procurement requirements found in 7 CFR 3016.

The State agency must receive prior Federal approval before procuring or requesting reimbursement for equipment valued at more than \$5,000 per item or in the aggregate. Review and approval of equipment acquisition is normally conducted during review of the proposed budget. Budget review should ensure that proposed equipment requests do not duplicate previous year's equipment purchases for the same project. Inventory records must be maintained for equipment that is paid for in full, or in part, with Federal funds. A physical inventory is required every two years.

A.2 Indirect Cost Rate

Indirect cost computation is based on policy prescribed by the Office of Management and Budget (OMB). The intent of the OMB policy is to ensure that the Federal Government bears its fair share of costs in accordance with generally accepted accounting principles.

Indirect costs are defined as those that benefit more than one program but are not easily identified to a specific program. The general rule is that if a cost can be readily attributed to a specific program it should be classified as a direct cost rather than be included in the indirect cost pool.

One basic computation method is to 1) identify all the costs that are considered indirect costs because they serve several programs (e.g., payroll, computer center, personnel), 2) total indirect costs, 3) identify all the programs that are served by indirect costs 4), total the direct costs of all the programs served. Divide total indirect costs by total direct costs, which results in an "Indirect Cost Rate." This rate is then applied to the direct costs of each program (in this case nutrition education) and the result is charged to the program as its "indirect cost."

Indirect Cost Plans and Applicable Rates- The use of indirect cost plans by colleges and universities is allowable. However, unless justification is provided, only the off-campus may be used. In addition, if additional categories, such as “other sponsored activities”, are covered, the instructional rates can not be used without justification. In most plans only one rate may be used for each program charged. As a result, any justification for using either the on-campus or off-campus rate must be based on where the majority of the allowable activities take place. In this case the allowable activities are defined as those activities that provide nutrition education to the recipient population. Other activities, such as research and data analysis, while allowable charges to the grant, are not understood to be the primary purpose of the grant, and therefore are not to be used in determining where the majority of the grant activities take place.

Small local agencies may not have staff with the expertise to develop indirect cost rates. They should, however, be able to go to their State agency for assistance or obtain contracted accounting services as an allowable program cost. Any costs of determining the indirect costs are themselves allowable costs that are included as either direct or indirect costs.

- If the State agency does not accept the responsibility for approving the indirect cost rate, or disapproves the rate, the FNS Regional Office will not accept the rate.
- The State agency must document its plan to indicate acceptance of the indirect cost rate.

State agencies are responsible for ensuring that indirect costs included as part of the State Food Stamp Nutrition Education Plans are supported by an indirect cost agreement approved by the appropriate cognizant agency and are claimed in accordance with that agreement. FNS may request documentation in support of an indirect cost rate. See definitions in Appendix D for more information on “cognizant agency”. Local agencies which do not have a cognizant agency to review and approve their rates may apply, through the State agency, for approval to use a rate developed either by or for the local agency. The FNS Regional office may accept or reject use of the rate based on the rate computation documents.

A.3 Waiver

Exclusivity Clause Waivers. Food stamp regulations require State agencies to provide “assurance” that nutrition education programs “are conducted exclusively for the benefit of Food Stamp Program applicants and participants” [7CFR 272.2(d)(2)(iii)]. These regulations are consistent with language in the Food Stamp Act. However, State agencies may pursue a waiver on a project basis to allow each project to conduct activities that inadvertently reach other low income individuals that are not currently participating. The waiver request must document on a project basis that such activities will generally be targeted to Food Stamp Program participants, applicants, and other low-income households.

To be approvable, each waiver request for each project must demonstrate that it is targeted generally to low income persons, and of the low income target population, that at least 50 percent has gross household incomes that do not exceed 185 percent of poverty. Projects with waivers should continue to target their programs to the most indigent of populations.

In developing data for waiver requests, general census, demographic data, school lunch free and reduced price data, and WIC participation may be used to calculate extent to which the population targeted meets the income criteria. Asking individuals for personal income data is not an appropriate means to determine whether the target audience is low income, and goes beyond the scope of data needs for waiver purposes.

Documentation to show that each project meets these criteria must be submitted in a waiver request. States may submit a separate waiver for each project or they may submit a listing of local projects for which they are seeking waivers. Regardless of format, the waiver request must contain project-specific information in sufficient detail to ascertain that each project is targeted to a low income population, at least 50 percent of which have gross incomes below 185 percent of poverty. Each project will be approved or denied separately. Statewide waivers are not permissible.

To be approvable, such waivers also must provide for the project to offer an educational message about the Food Stamp Program, its benefits, and how to apply.

Exceptions to Requirement for Exclusivity Clause Waivers

1. Food Distribution Program on Indian Reservations (FDPIR). Because persons eligible for the Food Stamp Program may participate in FDPIR in lieu of the Food Stamp Program, FDPIR participants may be targeted for the Food Stamp Nutrition Education Program without waiver, and will be considered as if participating in the Food Stamp Program.
2. Categorically Eligible Persons. Persons eligible for the Food Stamp Program by virtue of their allowable categorical eligibility consistent with the July 14, 1999 Food Stamp Program regulations may be targeted for the Food Stamp Nutrition Education Program without waiver, irrespective of their actual incomes.

Use of Private Cash Donations Waivers. Federal regulations prohibit the consideration of private cash donations as part of a State's expenditures for which FNS will reimburse 50 percent. [7CFR277.4 (c) &(d)]. However, a waiver is permissible with the following assurances:

1. no endorsements of donors or products will be given in connection with the nutrition education activities.
2. no funds will revert back to donor or benefit the donor.

Assurances that these conditions are met must be included in the State agency's waiver request and noted in the Nutrition Education Plan. As State agencies seek private cash donations, they need to understand these constraints. State agencies may also accept private inkind donations, but they may not claim their value for Food Stamp Program reimbursement. No waivers are available to permit private inkind donations to be considered as part of the State's expenditures for which FNS will reimburse 50 percent.

A.4 Donations from Non-Federal Public Agencies

As specified under 7 CFR 277.5(c), Federal reimbursement for the costs of services or property donated by other non-Federal public (i.e., government) agencies is allowable provided that the donated costs are not billed or claimed to another Federal program or used to match another Federal Program. The State agency must maintain records or an audit trail, which identifies how program funds are billed.

A.5 Non-Federal Public Agencies

A non-federal public agency is an organization of State or local government that is supported by funds derived from general tax revenues (receipts) of a State or locality specifically allocated from appropriate budgetary authority such as a State legislature, county or local government. This would include, for example, State or local government financed educational institutions and State funded hospitals. Funding from non-federal public agencies serves as the foundation for calculating a State's total costs of the Food Stamp Nutrition Education Program, of which 50 percent is reimbursed with Federal funds.

The Department's Office of General Counsel (OGC) has reviewed whether the term "non-Federal public agencies", as used in 7 CFR 277.4(c), can be interpreted to include "marketing orders, councils and commissions". OGC concluded that marketing orders, councils, and commissions may be included within the term, "non-federal public agency" for the purposes of using the donation as part of State cost for Federal matching funds depending on the source from which they derived the budgetary authority and the activity in which they are engaged. To be included as State cost, the budgetary authority must be delegated through some act of the State legislature or by a branch of State government and the activities in which the entity engage must be governmental in nature. The activities must affect the right of private parties through adjudication, rule making, investigating, prosecuting, negotiating, settling, or informally acting. Membership assessments should be relatively equal among the various members.

The State agency must describe in the plan the source of the entity's regulatory authority and the nature of the activities in which the entity is engaged. The State agency must also describe the relationship of the entity to the objectives of the proposed nutrition education activity. Funding provided by the marketing order should be used to support objectives of the nutrition education activity benefiting the food stamp households. Marketing orders funding for food stamp nutrition education should not be used to promote single-commodity nutrition education messages to the exclusion of the overall nutrition education objectives.

A.6 Medical Equipment

FNS has determined, based on OMB Circular A-87, that medical equipment or health services related to health assessments of recipients, obtaining clinical data on nutritional status, chronic disease or chronic disease risk assessments are not a necessary and reasonable cost to provide nutrition education in the FSP. Therefore, they are not allowable costs. For example, measurement of height, weight, skinfold thickness, blood pressure, cholesterol, blood glucose and iron levels are not allowable costs. However, salaries and benefits of personnel to administer dietary intake data questionnaires on nutrition knowledge and behaviors are allowable costs.

A.7 Gardening

Gardening is a beneficial project that leads to the economical production and consumption of healthy and fresh food. The provisions of OMB Circular A-87 allow USDA/FNS to make a reasonable judgment as to what is necessary and reasonable to deliver nutrition education. The cost for the rental or purchase of garden equipment (fertilizer, tractors), the purchase or rental of land for garden plots, seeds, plants, and other gardening supplies are not allowable food stamp nutrition education costs. Only educational supplies, curricula and staff salaries to teach gardening concepts that reinforce the beneficial nutrition aspects of gardening are allowable costs. (Note that participants may use program benefits (coupons/EBT) to purchase seeds and plants for gardening purposes).

A.8 Valuation of Publicly Owned Space

Charges For Publicly Owned Space- Space owned by public entity cannot be charged to a Federal grant based on private market rental rates. The entity can only recover the costs of space through a depreciation schedule or use allowable, place applicable charges for utilities, maintenance, and general upkeep.

Federal requirements regarding the valuation of publicly owned space is contained in Office of Management and Budget (OMB) Circulars A-87, 21, and

A-110 and Departmental regulations at 7 CFR 3016 and indicate that in no case may publicly owned space be “donated” or billed at fair market rental rates. The only method allowable for calculating reimbursement of publicly owned space is depreciation or use allowance. Fair market rates may not be used for publicly owned space regardless of whether they are direct billed or donated. The cost of space owned by a public agency is the acquisition cost of that space, plus maintenance and utilities. (FNS Policy Memorandum-March 9, 1998)

Example of Calculating Valuation of Publicly Owned Space-Only the depreciation or use allowance method may be used to charge FNS for use of publicly owned space. Depreciation is dividing the cost of the building over its useful life. For example, if a building cost \$50,000 to build and it had a useful life of 20 years, the yearly depreciation would be \$2500. This cost is spread over the square footage of the building, resulting in an annual rate per square foot. Food Stamp Program share would be the amount of space that is used for the FSP. A use allowance is used when the building is fully depreciated. You are allowed to charge no more than 2 percent of the cost of the building per year. In the example above, States could only charge \$1000 per year.

A.9 Time Records

Time records are required for all nutrition education staff devoting less than 100 percent of their time to nutrition education unless a federally approved Random Moments Time Study is used to allocate the time spent on allowable activities. A semi-annual certification for staff which spend 100 percent of their time on nutrition is required.

States preparing Food Stamp Nutrition Education Plans should review staff allocation time records for activities eligible for reimbursement. Budget sections of State plans should confirm that time records are documented weekly for nutrition education staff devoting less than 100 percent of their time to the project. Grantees who have federally approved Random Moments Time Studies need not use time records to document time spent on allowable activities. State agencies may submit alternative methods of calculating time with appropriate justification for consideration by the FNS regional office. The FNS region may consider and approve alternative methods of calculating time that provide a reasonable assurance of accuracy in the time estimate.

Time records need not be submitted with the plan but should be maintained by the project for audit. (FNS Policy Memorandum-April 1998)

Alternatives To Time Records- For staff employed by universities and colleges, an alternative to time records or time studies is allowed under OMB Circular A-21. The alternative is called Plan Confirmation. This Plan outlines grant activities scheduled for the academic period. FNS will accept time charges based on such a plan if (1) the plan is approved by the appropriate cognizant Federal agency and, (2) the plan includes specific references to time and staff devoted to the Food Stamp Nutrition Education Program.

A.10 Membership, Subscription, and Professional Activity Cost

Cost of institution memberships in business, technical, and professional organizations are allowable. These memberships, subscriptions, and professional activity costs should be consistent with the effort to promote the provision of quality nutrition services to Food Stamp participants. Costs of institutional memberships for nutrition personnel that work directly with the Food Stamp nutrition education project are reimbursable. The cost to the institution should be prorated according to the percentage of time actually spent by the employee in performing nutrition education activities for the food stamp project. Professional registration or license fees paid by individuals would not be allowable costs since the fees would be considered personal expenses, not institutional expenses.

A.11 Nutrition Education Reinforcement Materials

Nutrition education reinforcement materials refers to a class of goods that are given to applicants, participants, potential participants, or persons closely associated with the Food Stamp Program (such as staff) containing or conveying good nutrition messages for the purpose of reinforcing nutrition messages and promoting good nutrition practices; such items must have a direct relationship to program objectives and the expected behavior change. Other terms that are used to describe these items include memorabilia, souvenirs, promotional items, incentives, and educational extenders. Such items are allowable costs only if they are deemed reasonable and necessary, contain or reinforce good nutrition messages, and are of nominal value (\$3 or less per item).

FNS could not relate program reinforcement materials to any of the cost items specifically mentioned in the OMB Circular A-87 and A-122. FNS/USDA must, therefore, apply the circulars' general rule for determining the allowability of costs, paramount among which are the reasonable and necessary cost tests.

Reasonable costs

- provide a program benefit generally commensurate with the costs incurred,
- are in proportion to other program costs for the function that the costs serve,
- are a priority expenditure relative to other demands on availability of administrative resources, and
- carry constructive nutrition education messages.

Necessary costs

- are incurred to carry out essential program functions, and
- cannot be avoided without adversely impacting program operations.

Program reinforcement materials for nutrition education should:

- be targeted to Food Stamp Program participants,
- have a clear and useful connection to particular FNS/Food Stamp Program nutrition education messages,
- either convey enough information to be considered educational or be utilized by participants to reinforce nutrition education messages,
- have value as nutrition education aids,
- be reasonable and necessary costs
- be offered only after weighing and assessing other relative needs and cost effectiveness.
- be of nominal value of \$3 or less per item.

Examples of Allowable and Unallowable Program Reinforcement Materials

FNS/USDA is not able to provide exhaustive lists of specific allowable and unallowable items. However, using the criteria listed in the preceding paragraph, some illustrative examples of allowable and unallowable program reinforcement materials are provided below:

Examples of Allowable Nutrition Education Incentive Items:

Calendars that contain important nutrition education messages, refrigerator magnets picturing the Food Guide Pyramid, measuring cups, measuring spoons or other items of nominal value which reinforce an important nutrition message. Examples of available messages include, Thermy™ the food thermometers' safety message ("It's safe to bite when the temperature is right"), the 5 A Day Campaign, or USDA's **EAT SMART. PLAY HARD.™** Campaign.

Examples of Unallowable Nutrition Education Incentives Items:

Celebratory items, and items designed primarily as staff morale boosters; items (even of nominal value) which have no nutrition education message; any program incentive item intended for persons who are not Food Stamp Program participants or applicants, or with a waiver, low-income non-participants; any item costing more than 3 dollars.

A.12 Physical Activity

The *Dietary Guidelines for Americans (DGAs)* (<http://www.usda.gov/cnpp>) provides the framework for nutrition policy in FNS nutrition assistance programs. The 2000 DGA embrace maintenance of a healthy weight and improved fitness level. As such, FNS supports the 2000 DGAs concept on physical activity. The provisions of OMB Circular A-87 allow USDA/FNS to make reasonable judgments as to what is necessary and reasonable to deliver nutrition education. Given the new DGA, the inclusion of physical activity promotion, as a part of the Food Stamp Program Nutrition Education and promotion is an allowable expenditure.

The following is guidance on what constitutes allowable Food Stamp Program nutrition education costs in support of the new physical activity DGA. Essentially, such allowable costs are limited to activities that educate about and promote physical activity, such as providing Food Stamp Program participants with information and encouragement to exercise.

It is recommended that State agencies balance program goals for promoting and supporting physical activity with other competing priorities, cost accountability issues, and liability concerns. The latter is crucial because of the risks associated with engaging in physical activity, which must be seriously considered.

Examples of Unallowable Physical Activity Education and Promotion Costs

Costs incurred for health club or gym memberships, dues, equipment, (such as bicycles, treadmills, stair steps, hula-hoops, weights, jump ropes, and the like); facilities (rental or modifications); or exercise leaders for ongoing exercise classes.

Examples of Allowable Physical Activity Education and Promotion Costs

Food Stamp Program State agencies may make physical activity education and promotion available to Food Stamp Program participants in a variety of economical ways.

The development of educational materials to teach physical activity concepts and to reinforce the health benefit of physical activity are allowable costs.

As customary, when developing materials, we recommend the utmost care be taken in the assessment of the target audience and its needs in the provision of accurate physical activity statements and advice. A certified physical fitness professional should be consulted throughout the development phases of these materials. The cost of such consultation is allowable if it meets a reasonable and necessary test.

Purchases of educational materials promoting physical activity for program participants. Examples of educational materials include brochures, newsletters, posters, public service announcements, and audiotapes. These materials may be purchased, or obtained free of charge, from reliable sources such as government organizations, physical activity associations, or other authorities on the subject.

Physical activity education and promotion as part of nutrition education sessions in the Food Stamp Program may include provision of advice, demonstrations (instructional in nature, on a one-time basis), and community resource information, (such as a free local fitness event) in order to encourage program participants to engage in regular physical activities.

Additional examples of acceptable physical activity promotion may include:

- Information on local sites where Food Stamp Program participants can access a diverse range of low or no-cost activities appropriate for different ages and physical abilities.

- Physical activity bulletin boards or displays around the food stamp offices, clinics or community.
- Referral to library or web site resources.

- Development and provision of information and resource lists to Food Stamp Program recipients on how to promote safe and enjoyable physical activities. This information may also be available from:

- Affiliates of voluntary health organizations (e.g., the American Heart Association).
- State and local health departments.
- Governor's Councils on Physical Fitness and Sports.
- National Fitness Coalition
- Coalition for Promotion of Physical Activity
- State associations for health, physical education, recreation, and dance.
- Materials can be ordered in bulk from:

The President's Council On Physical Fitness and Sports
 200 Independence Avenue SW
 Room 738-H
 Washington, D. C. 20201-0004
www.fitness.gov

The American Dietetic Association
 National Center for Nutrition and Dietetics
 216 West Jackson Boulevard
 Chicago, Illinois 60606-6995
www.eatright.org

- Another source of information is:
 National Recreation and Park Association
 22377 Belmont Ridge Road
 Ashburn, Virginia 20148-4501
info@nrpa.org<<mailto:info@nrpa.org>>

A.13 Medical Nutrition Therapy

This is not an allowable cost. The Food Stamp Nutrition Education Program should lie within the general scope of the Food Stamp Program. Medical nutrition therapy is not within the scope of the Food Stamp Program. Food Stamp nutrition education funds may pay for general nutrition education for all participants but may not be used for medical nutrition therapy. Since this activity is an unallowable cost for the Federal share of costs, it is also not allowable for use in meeting the State match. If a Food Stamp Program educator becomes aware of an individual's need for a therapeutic diet, a local referral may be made.

The primary scope of the Food Stamp nutrition education program is to encourage the purchase, preparation and consumption of nutritious foods consistent with the *Dietary Guidelines for Americans* and *The Food Guide Pyramid*. These two documents provide the policy basis for dietary guidance provided by all USDA nutrition assistance programs including the Food Stamp Program.

Dietary guidance that is provided as part of medical nutrition therapy is beyond the scope of the *Dietary Guidelines*, *The Food Guide Pyramid* and the Food Stamp Nutrition Education program. According to the American Dietetic Association, medical nutrition therapy involves the assessment of nutritional status and the assignment of diet, counseling, and/or specialized nutrition therapies to treat an individual's illness or condition. Medical nutrition therapy has been integrated into the treatment guidelines for a number of diseases, including cardiovascular disease, diabetes mellitus, hypertension, and obesity based on the efficacy of diet and lifestyle on the treatment of these conditions. (See Definitions in Appendix D for a fuller definition of Medical Nutrition Therapy.)

B. Sources of State Share Program Cost

B.1 Private, Third-Party, In-kind Donations

The Food Stamp Nutrition Education State plan is approved for a specified level of funding. The Federal Government reimburses the State for 50 percent of allowable costs incurred by the State. The Federal Government is authorized to reimburse a State agency only for actual expenditures incurred.

Because the value of private, third party, in-kind donations, including volunteer services, do not represent any State expenditure or outlay, they are not considered as a cost to the program, and thus are not reimbursable.

As specified under 7 CFR 277.4(e), the value of services rendered or the value of goods (i.e., in-kind) donated by private, third parties, including volunteers, are not allowable for reimbursement purposes under the Food Stamp Program. However, State agencies are not prohibited from accepting private, third party in-kind donations.

B.2 Private, Third-Party, Cash Donations

Private, third-party cash donations are not generally allowable for reimbursement purposes. However, the State agency may request a waiver. (See A.3 for Waivers)

B.3 Other Federal Funds

The State agency's share of program costs may not include funds paid by the Federal Government under another assistance agreement unless authorized under that agreement and its laws or any non-Federal funds contributed for another federally-assisted program unless authorized by Federal legislation. Consequently, Federal funds provided by USDA's Cooperative State Research Education and Extension Service (CSREES) to the 1862 and 1890 Land Grant Universities or to the State's Cooperative Extension Service (and any State or non-Federal match for those Federal funds) may not be used as part of the State agency's share of Food Stamp Program costs. However, certain Federal legislation supporting funding to Indian Tribal Organizations (ITO) contains "other Federal laws notwithstanding" language which allows tribal governing bodies to use Federal funds as matching to receive other Federal funds. An ITO that chooses to submit a nutrition education plan for inclusion in the State plan can use Federal funds as a local source of matching to request reimbursement for food stamp administrative funds.

In such circumstances, the State agency must provide assurance that the source of local matching funds is a federal grant containing the "notwithstanding" language, and must clearly specify the intention to use Federal funds, the amount of the funds, the Federal agency source, and the citation that authorizes those Federal funds to be used as a match for other

Federal funds. Also, a copy of the grant agreement between the ITO and the Federal agency must be available for review.

C. Other Miscellaneous Issues

C.1 Federal Royalty Rights

The Food and Nutrition Service reserves a royalty-free, non-exclusive right to reproduce, publish, use or authorize others to use videos, computer programs such CD-ROM and related source codes, literature, or other products produced with Food Stamp Program funds for government purposes. The State and local agencies may sell videos or literature to other States for Food Stamp nutrition education purposes at the cost of reproduction, plus shipping and handling. If a State agency (or local agency) realizes a profit from the sale of nutrition education materials, [videos, literature, etc. paid with Federal dollars], it must report the amount to FNS as program income on the SF-269 form.

C.2 Case File Information

The Expanded Food and Nutrition Education Program (EFNEP), administered by the Department's Cooperative Extension Service pursuant to Section 11(f) of the Food Stamp Act of 1977, as amended (the Act), satisfies the exception in Section 11(e)(8) of the Act regarding disclosure of information obtained from applicant households to other persons directly connected with the administration of federally assisted State programs. The Cooperative Extension Service's program is a federally assisted program and as such, upon request to the State agency administering the Food Stamp Program, may be provided confidential applicant household information. Information released may solely be used by a State's EFNEP agency to assist in delivering nutrition education training to food stamp applicant and participant households.

C.3 Examples of Allowable and Unallowable Costs

The following table provides examples of allowable and unallowable costs.

EXAMPLES OF ALLOWABLE COSTS

| <u>ALLOWABLE</u> | <u>UNALLOWABLE</u> |
|--|---|
| Literature/Materials | |
| Fact sheets, brochures, newsletters, etc., that are produced for distribution to food stamp recipients and applicants about nutrition education related topics such as food choices, food budgeting and food preparation. Costs for nutrition education material may be shared between programs provided the State agency describes the interagency agreement that exists between the programs, and the method used for allocating costs between the programs. | Any nutrition education literature paid for by another federal or private program or source. Any material that endorses or promotes brand name products or retail stores. Manufacturer's or store (cents off) coupons. Encouraging or influencing a store's pricing policy. Any activity or material to lobby or influence Federal, State, or local officials to pass or sign legislation or to influence the outcomes of an election, referendum, or initiative. |
| Audiovisuals | |
| Videos targeted to food stamp applicants and recipients about nutrition education related topics. | Any audiovisual paid in full by another program or source and any audiovisual that endorses or promotes brand name products or retail stores. |
| Media Campaigns | |
| Local radio and television announcements of nutrition education events for food stamp applicants and participants. Media announcements promoting nutrition messages to food stamp households within the community. With a project waiver, the target audience may be expanded to the general low-income population. | Media campaigns to promote or present nutrition messages, which are not explicitly targeted to low-income or to the food stamp eligible population within the community. |
| Equipment | |
| Purchase of office equipment. A county can donate equipment and use fair market value; however, any fair market value has to be adjusted to reflect Federal funding provided for the equipment. (This can be arrived at by multiplying the fair market value times the State's percentage share invested in the equipment.) | Electronic equipment that exceeds prior approval thresholds (i.e., \$5,000) unless such prior approval is received from FNS (e.g., CD-ROM purchases). Medical Equipment. |
| Food Demonstration | |
| Cost of food for recipe/taste testing purposes and cost of kitchen equipment and supplies necessary for food storage, preparation and display of food prepared for demonstration purposes. Food samples associated with a nutrition education lesson. | Distribution of nutrition education reinforcement items over \$3. |

| | |
|------------------|--------------------|
| ALLOWABLE | UNALLOWABLE |
|------------------|--------------------|

| Nutrition Education | |
|--|--|
| <p>Classroom setting (salaries, space, equipment, materials) for food stamp recipients on nutrition related topics (e.g., food budgeting, preparation, safety). Primary purpose of class must be to provide nutrition education. If nutrition education is included with other topics, only that portion of class pertaining to nutrition education is an allowable cost.</p> <p>The pro rata share of costs of classes that are provided in conjunction with another program (e.g., WIC), provided the State agency describes the interagency agreement that exists between the programs, and the method for allocating costs between the programs.</p> | <p>Classes that are designed to provide case management or "life skills" training (e.g., classes on English as a second language, parenting, child development, crisis management, rental information).</p> <p>Physical activity exercise classes, equipment on facilities. (Refer to Appendix C Physical Activity Cost Policy Section)</p> <p>Medical Nutrition Therapy. (Refer to Appendix D, Definitions)</p> <p>Nutrition education costs that are charged to another Federal program (e.g., WIC, EFNEP, Head Start, etc.)</p> |
| Space Allocation | |
| <p>Space allocated between programs in which the plan for the space/cost allocation between programs is documented and the costs are tracked.</p> | <p>In-kind charges for space that is donated by a private third-party or costs that are fully funded by another program (e.g., USDA WIC and EFNEP programs).</p> |
| Training and Other Costs | |
| <p>Training for staff related to providing nutrition education to food stamp applicants/recipients.</p> <p>General briefings to community health care providers generally serving low-income communities about Food Stamp Program nutrition education in the community.</p> <p>Reimbursement for personal costs (such as child care and transportation) for recipients of the Food Stamp Nutrition Education Program to actively participate in focus groups, needs assessments and advisory groups to inform and improve nutrition education effectiveness.</p> | <p>Personal costs for recipients to attend nutrition education activities such as child care and transportation services.</p> <p>Reinforcement items over \$3. (Refer to Appendix C Cost Policy Section- Program Reinforcement Items)</p> <p>University courses on technical or clinical subjects that are not relevant to the practical delivery of participant nutrition education.</p> |

APPENDIX D

DEFINITIONS

These definitions are for clarification of terms that maybe used throughout the guidance.

Activity refers to actual work performed by program personnel to implement objectives.

Applicant refers to person/households who have actually applied for the FSP.

Behavior indicates action rather than knowledge or attitudes.

Behaviorally Focused Nutrition Messages are those that are (a) related to healthy food choices, for example, eating lower fat foods, adding one fruit each day, and switching to whole grain breads; (b) related to other nutritional issues, for example encouraging breast feeding practices, or physical activity (c) related to the environmental impact of dietary practices, including safe food handling, promoting community walking groups (d) related to food shopping practices that increase purchasing power and availability of food including using store coupons, joining store clubs for added discounts, and purchasing in bulk, and (e) food security such as applying for nutrition assistance programs (i.e. WIC, Child Nutrition Programs, Food Distribution Programs, etc).

Budget Projection, FNS-366A is a budget report submitted by State agencies to FNS to request the amount of annual funds needed to operate the Food Stamp Program. It is the form used to support the annual funding request. Any need for additional funds require a revised 366A.

Cognizant Federal Agency refers to the Federal agency that has been identified by OMB that is responsible for establishing indirect cost rates. For more information see item A.2 Indirect Cost Rate in Appendix C.

| <u>Organization</u> | <u>Cognizant Federal Agency</u> |
|----------------------------------|---|
| State Public Assistance Agencies | Dept. of Health and Human Services (DHHS) |
| All Other State agencies | Federal agency identified by OMB |
| Educational Institution | Department of Education, Department of Defense-Naval Research or DHHS, depending on which provided more Federal funds over the last 3 years |
| Nonprofit Organization | Normally the Federal agency with the largest dollar value of award with the organization |

Direct Contact is a face-to-face contact to deliver nutrition education, an educational class, workshop, group discussion, or a one-on-one intervention.

Effectiveness is the extent to which pre-established objectives are attained as a result of program activity, as indicated by performance measures.

Fiscal Year is the Federal Fiscal year that runs from October 1st of one year through September 30th of the following year.

Grantee is a primary recipient of Federal grants funds.

Indirect Contact is the delivery of nutrition education to a person through an indirect and generalized strategy, such as public service announcements, billboards, newsletters, and social marketing.

Lobbying is any activity or material to influence Federal, State, or local officials to pass, or sign legislation or to influence the outcomes of an election, referendum, or initiative.

Low Income Persons are people participating in or applying for the Food Stamp Program, as well as people that may be eligible because low financial resources, with gross household incomes at or below 185 percent of poverty. National School Lunch Program data on number of children eligible for free and reduced price meals, which represents children in families with incomes at or below 185 percent of poverty, or Census data identifying areas where low income persons reside, are available data sources that can be used to identify low income populations. Participation in WIC may also be used as a proxy for low income since WIC participants have gross family incomes below 185 percent of poverty.

Marketing Orders generally refer to USDA or State programs that support prices and consumption of various fruits, vegetables, milk, eggs and meat programs. Funds are collected from the producers and used to publicize the item in question. Limits to production are also enforced. (For example both Florida and California have orange marketing order boards). With some constraints, money and services provided by marketing boards can compromise an allowable component of a State Plan. However, the promotion of a specific item (for example, only oranges) is not an allowable expense.

Medical Nutrition Therapy Services means the assessment of the nutritional status of patients with a condition, illness, or injury that puts them at risk. This includes review and analysis of medical and diet history, laboratory values, and anthropometric measurements. Based on the assessment, nutrition modalities most appropriate to manage the condition or treat the illness or injury are chosen and include the following:

- Diet modification and counseling leading to the development of a personal diet plan to achieve nutritional goals and desired health outcomes.
- Specialized nutrition therapies including supplementation with medical foods for those unable to obtain adequate nutrients through food intake only; enteral nutrition delivered via tube feeding into the gastrointestinal tract for those unable to ingest or digest food; and parenteral nutrition delivered via intravenous infusion for those unable to absorb nutrients. Such services are not allowable costs in the Food Stamp Nutrition Education Program.

Medical Nutrition Therapy Services are not allowable Food Stamp Nutrition Education Program costs.

Needs Assessment is the process of identifying and describing the extent and type of health and nutrition problems and needs determined among individuals and/or target populations in the community. Focus groups, interviews, and short surveys are usually used to assess the needs of the target audience. Pre-established data from survey research conducted with the target population may also be used.

Non-Federal Public Agency is a State or local government agency or entity, including State universities and colleges, and instrumentalities of the State, such as organizations that are chartered by State or local governments for public purpose.

Nutrition Education Plan is an official written document, which describes the nutrition education services to be provided under the Food Stamp Nutrition Education Program. It should clearly describe goals, priorities, objectives, activities, procedures used, and resources including staff and budget, and evaluation method.

Project means a distinctly specific unit of nutrition education interventions at the local level with a specifically identified low income target population.

Public Education Outreach Message is a brief message providing information on the availability, benefits, and application procedures for the Food Stamp Program, preferably with information on local application sites, (or a toll-free number, or other useful information on how to find services). When Food Stamp Nutrition Education is provided to low income persons not participating in the Food Stamp Program, by virtue of approved waivers, a critical component of the nutrition message must be to provide an educational message about the availability and benefits of the program and how to apply. This should be done "in the context" of nutrition education, meaning the Food Stamp Program should routinely be referenced in nutrition education sessions and on materials as a source of nutrition assistance to help low income persons achieve a better diet.

Random Moment Time Studies are time studies conducted through the use of a sampling methodology rather than through a log of each time period worked by the employee. The studies are used to determine the percentage of time worked by activity or program. The purpose of the study is to allocate the cost of time worked among the various activities and funding sources.

Social Marketing is an audience-centered approach that features multiple and reinforcing channels of communication that seek to influence behavior. Although social marketing efforts often make use of television, radio ads, videos, and brochures, these materials by themselves do not constitute social marketing. Rather, social marketing entails a comprehensive program in which these materials are employed as part of multiple tactics to reach a target audience. Social marketing emphasizes the importance of keeping the target audience and partners involved in needs assessment, message development, and refinement of messages and delivery strategies. The social marketing sciences offer qualitative and quantitative research methods needed to understand consumer needs and behavior. When social marketing is used as a strategy for nutrition education in the Food Stamp Program, food stamp participants or applicants must be the primary target audience, and a waiver must be sought for approval for strategies that may have an incidental benefit to other low income persons.

State Agency means the agency of State government, including the local offices thereof, which is responsible for the administration of the federally aided public assistance programs within the State, and in those States where such assistance programs are operated on a decentralized basis, it includes the counterpart local agencies which administer such assistance programs for the State agency.

Subgrantee means the organization or person to which a State agency makes payments for acquisition of goods, materials, or services for use in administering the Food Stamp Program and which is accountable to the State agency for the use of funds provided. (7CFR277.2)

APPENDIX E

FOOD STAMP NUTRITION CONNECTION

The Food and Nutrition Service (FNS) and the National Agriculture Library's Food and Nutrition Information Center (FNIC) collaborated to develop an exciting online resource.

The new website, called **Food Stamp Nutrition Connection**, is designed to improve access to Food Stamp Program nutrition resources. Educators nationwide can use this site to identify curricula, lesson plans, research, and training and tools and participant materials. The first phase of the Food Stamp Nutrition Connection was launched on January 31, 2002 and is available at <http://www.nal.usda.gov/foodstamp>

At the web site, you will find nutrition tools and information specifically addressing the needs of the low-income audiences. This resource is not restricted to materials developed with funding from the Food Stamp Program. Further, material on the site are reviewed for basic quality, but their inclusion on the site does not constitute endorsement by USDA. Major sections of the site include a Training Center, Resource Library, Hot Topics A-Z and Program facts.

We encourage you to subscribe to FSNC-Talk, an electronic mailing list for national, regional and state Food Stamp Program nutrition education contacts. This is a great way to interact with Food Stamp nutrition education contacts around the nation. Information about how to join the list is available on the Food Stamp Nutrition Connection web site.

Also, you're invited to share your materials with FNIC so that others may benefit from your experience and expertise. A hard copy and an electronic copy of each document is preferred.

Updates and developments are planned for the Food Stamp Nutrition in the upcoming year-- so check back often for new additions. If you have any questions about the resource system or information provided, contact FNIC's Food Stamp Nutrition Connection staff by telephone at (301) 504-5719, by fax at (301) 504-6409, or by e-mail at FSNC@nal.usda.gov

Food Stamp Nutrition Connection

A new online resource for nutrition educators!

The Food and Nutrition Service and the National Agricultural Library are pleased to announce the arrival of a new web site designed to improve access to Food Stamp Program nutrition resources.

Connect to these resources and more at the Food Stamp Nutrition Connection:

- **Training Center-** Browse through our collection of social marketing and programming resources or learn about upcoming conferences and workshops.
- **Resource Library-** *Click n' go* to ready-to-use educational materials, identify community resources, explore state newsletters or share your resources.
- **Hot Topics A-Z-** Get statistics, general information and reports about the hottest nutrition topics.
- **FSNC-Talk-** Network with national, regional, and state Food Stamp nutrition education contacts.
- **State Gates-** Quickly go to state Food Stamp nutrition education programs.
- **Program Facts-** Learn more about Food Stamp nutrition education.

<http://www.nal.usda.gov/foodstamp>

